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Atty. Dkt. No. ROC920000304US1

REMARKS

This is intended as a full and complete response to the Final Office Action dated July 7, 2005, having a shortened statutory period for response set to expire on October 7, 2005. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1 and 3-17 are pending in the application. Claims 1 and 3-17 remain pending following entry of this response.

Applicants' Response to Elections/Restrictions

In the Examiner's *Final Office Action dated July 7, 2005*, Examiner states "newly submitted claims 13-17 are directed to an invention that is independent or distinct from the invention originally claimed" because the newly submitted claims deal with a "plurality of applications". However, Applicants maintain, as noted in the previous responses, that the restriction with respect to the claims describing "a plurality of applications" is improper.

Claim Rejections - 35 USC § 102

Claims 1-4, and 8-12 are rejected under 35 U.S.C. 102(e) as being anticipated by *Meltzer et al.* (U.S. Pat. No. 6,125,391, hereinafter *Meltzer*).

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim... *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, *Meltzer* does not disclose "each and every element as set forth in the claim". Specifically, *Meltzer* does not disclose "at least one specification document configured to produce metadata defining a relationship between data of the request in

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the original format and data of the request in the transformed format, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol". The Examiner argues that *Meltzer* discloses "at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format" in Figure 9 and "metadata compris[ing] a plurality of metadata instances each configured to support a different request protocol" at Col. 32, Lines 12-55.

The Examiner appears to suggest that the BID built by the process in Figure 9 (See Col. 30, Line 31) corresponds to the claimed "at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format" and that Common Business Library (CBL) modules and Schema document type definitions (DTDs) in the cited section (See Col. 32, Lines 12-55) correspond to the produced "metadata compris[ing] a plurality of metadata instances each configured to support a different request protocol".

However, Applicants submit that the cited CBL modules and DTDs are not "metadata defining a relationship between data of the request in the original format and data of the request in the transformed format" because the CBL modules and DTDs do not describe a "request in a transformed format" and furthermore, the cited section of *Meltzer* does not describe that the BID is "configured to produce" the cited CBL modules and DTDs. See Col. 32, Lines 12-55.

The section cited by Examiner shows a Schema DTD (Col. 32, Lines 45-55) as well as an instance of a "datetime" module (Col. 32, Lines 25-35) defined by the Schema. Both the depicted Schema and the "datetime" module are stored in the CBL repository. Col. 32, Lines 12-5. The CBL repository consists of *information models* for generic business concepts including business description primitives like companies, services, and products; business forms like catalogs, purchase orders, and invoices; and standard measurements, date and time, location, and classification codes. Col. 31, Lines 41-58. The DTD is the formal specification or grammar for *documents of a given*

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type; it describes the elements, their attributes, and the order in which they must appear. Col. 31, Lines 26-28.

As evidenced by the emphasized words ("information models" and "documents of a given type"), the cited documents merely describe business documents (e.g., forms). The business documents specify appropriate documents which may be used in a system such as that of *Meltzer*. Thus, the documents in the cited section do not describe "metadata defining a relationship between data of the request in the original format and data of the request in the transformed format" because the cited section and documents do not refer to "a request in a transformed format".

Furthermore, as stated above, both the depicted Schema and the "datetime" module are stored in the CBL repository. Col. 32, Lines 12-5. The CBL repository is a common library used by developers to implement industry messaging standards and conventions (thus, the name, "Common Business Library"). See Col. 31, Lines 41-55. Thus, the contents of the CBL, cited by the Examiner, are in no way produced from the BID. See *id.* Accordingly, the cited sections do not describe "at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol." Withdrawal of the rejection is respectfully requested.

Examiner's Response to Applicants' Arguments

In the Examiner's *Final Office Action* dated July 7, 2005, Examiner provides a response to Applicants' arguments.

In response to Applicants' argument that *Meltzer* does not teach "at least one specification document configured to produce meta data defining a relationship between data of the request in the original format and data of the request in the transformed format," the Examiner directs the Applicants' attention to Fig. 15 item 1506, "which shows the relationship between the host and source through a mapping process". Item 1506 in Figure 15 depicts a translation table. First, Applicants note that the translation table 1506 "is used to support the translation from non-XML form into XML form" (Col.

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84, Lines 32-33) and this translation is different from the BID apparently being previously cited by the Examiner which "tell[s] potential trading partners the services the company offers and the documents to use when communicating with such services." (Col. 2, Lines 42-44).

Further, Applicants note that the cited translation table 1506 is not "at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol." Instead, the translation table "is used to support the translation from non-XML form into XML form." Col. 84, Lines 32-33.

The Examiner does not specifically state which portion of "at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol" the cited translation table 1506 is supposed to disclose. If Examiner is suggesting that the translation table is the "at least one specification document" described in Applicants' claim, then the cited section does not describe that the translation table 1506 "is configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format." If Examiner is suggesting that the translation table 1506 is "metadata defining a relationship between data of the request in the original format and data of the request in the transformed format," then the cited section does not describe "at least one specification document configured to produce" the translation table 1506. Accordingly, the cited portion of *Meltzer* does not describe "at least one specification document configured to produce metadata defining a relationship between data of the request in the original format and data of the request in the transformed format, wherein the metadata comprises a plurality of metadata instances each configured to support a different request protocol."

In response to Applicants' argument that the cited parts of the *Meltzer* reference

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are not arranged as required by the claims, the Examiner states in part "in regards to the system claim and the different cited locations, these cited locations are all part of the system capabilities of the of *Meltzer* and are therefore integrated." Applicants again note the language of *In re Bond* which states that "the elements must be arranged as required by the claim..." *In re Bond*, 910 F.2d 831. Examiner's suggestion that *Meltzer* shows integration of the cited components merely because they are disclosed in a single document is directly contrary to the language of *In re Bond* which requires that the cited reference show the *arrangement* in addition to the *elements*. Indeed, the Examiner's Action merely cites to figures of *Meltzer*, and fails to describe which elements in the cited figures Examiner believes to be integrated and how the elements are integrated. Accordingly, Applicants maintain that the prior argument is correct with respect to Examiner's rejection and respectfully request that the rejection be withdrawn.

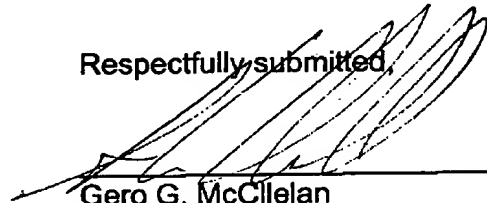
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Conclusion

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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